

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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Benahdam Hurt,	)	
	)	
Plaintiff,	)	
	)	Case no. 1:17-cv-7909
	)	
v.	)	
	)	Honorable Rebecca R. Pallmeyer
James P. Corcoran, <i>et al.</i> ,	)	
	)	
Defendants.	)	

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**DR. JOANNE LANGLEY'S MOTION FOR LEAVE TO FILE RESPONSE TO PLAINTIFF'S MOTION  
TO COMPEL [209], INSTANTER**

The subpoena respondent, Joanne Langley, Psy.D., by and through her attorney, Kwame Raoul, the Attorney General of Illinois, hereby moves this Honorable Court to grant her leave to file a Response in Opposition to Plaintiff's "Motion to Compel Dr. Joanne Langley to Answer Deposition Questions in Writing, and for Fees Sanctions [*sic*]" ("Motion to Compel"), *instante*, and in support thereof states as follows:

1. On July 25, 2022, Plaintiff filed his Motion to Compel, seeking to compel Dr. Langley to answer written deposition questions that have never been served upon her before and without a Rule 37.2 conference. Plaintiff's Motion also seeks \$3,300 in monetary sanctions against Dr. Langley's counsel, Assistant Attorney General Daniel N. Robbin.
2. Under this Court's standing procedures, briefing is not typically entertained on discovery motions. In the interests of fairness and justice, Dr. Langley prays this Court will grant her leave to file a Response in Opposition to ensure her positions are made of record.
3. A copy of Dr. Langley's proposed Response is attached here as an Exhibit.

WHEREFORE, for the foregoing reasons, Subpoena Respondent Dr. Joanne Langley respectfully prays that this Court grant her leave to file the attached Response in Opposition to Plaintiff's Motion to Compel [209], and for such other relief that may be just and proper.

Dated: July 29, 2022

Respectfully submitted,  
JOANNE LANGLEY, PSY.D.

KWAME RAOUL  
Attorney General of Illinois

/s/ Daniel N. Robbin  
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Corcoran, M.D., and Joanne Langley, Psy.D.*